



**Department of Natural Resources
Initial Assistance Visit Survey Results
February 10, 2006**

Introduction

At the direction of Director Childers, staff conducted its first environmental compliance assistance visits beginning November 1 and concluding Dec. 2, 2005. These visits were an initial pilot project before implementing this initiative for newly permitted operations beginning in 2006.

The environmental compliance Initial Assistance Visit (IAV) was an offer for an onsite visit with appropriate representatives(s) of the facility following permit issuance. The visit was to improve the understanding of the permit and environmental requirements, to enhance environmental compliance with the regulations that apply to the new permit holder's unique operations, and to provide on-site technical assistance.

The IAV is voluntary and is a visit that is scheduled with the facility. The Department of Natural Resources inspector performs a detailed review of the permit to verify its requirements for the facility then observes operations specific to the permit to determine if the facility is following the permit. The IAV includes providing relevant guidance documents and other helpful information to the new permit holder.

History

IAV's were conducted throughout the state by all five regional offices on water (land disturbance permits), air (newly permitted air sources), drinking water (newly activated public water supplies), land reclamation (limestone quarries), and hazardous waste (small and large quantity generators).

Areas where the permittee had good performance, as well as areas of concern were discussed during each IAV. Enforcement actions were not initiated during the IAV unless a facility had acute violations. (An acute violation is one immediately or imminently harmful to the environment or public health). Only one very serious violation was found during the initial pilot but it was corrected so no enforcement action was necessary. IAVs revealed that there were no violations at 56 percent of the facilities and compliance assistance provided by department staff helped the remaining 44 percent get into compliance.

During each IAV, the inspector provided a short survey and asked the new permit holder to fill it out and return it to the Ombudsman Program. The survey was to determine if the IAVs were helpful to the permit holder and if solutions were identified to any problems that might have been found. Surveys that were not returned were followed up on by the ombudsmen; more than 82 percent of the surveys were returned.

Summary

Surveys were kept to 8 yes or no questions with an area for comments.

Two questions dealt with the department's ability to communicate effectively with the new permit holder before arrival at the site. Professionalism, courtesy and communication are measures of the confidence the new permit holder has in the department. The results for these

two questions indicate that department staff were very professional in the conduct of the IAVs and communicated effectively prior to the IAV (Questions 1 and 2 on the survey).

Two questions helped the department measure its ability to communicate effectively with the permit holder during the IAV in order to ensure permit holders have a good understanding of department requirements and thus enhance environmental compliance in the state of Missouri.

Surveys indicated that the inspectors spent an average of about 1 hour 45 minutes with each permit holder. (This average will be used to calculate the staffing needs to conduct an IAV for each new permit issued). (Questions 3 and 4 on the survey). See Table 3.

Two questions asked if information was conveyed in an understandable manner and if the new permit holder found the department representative to be knowledgeable in answering any questions. All surveyed answered yes to both questions. (Questions 5 and 6 on the survey).

One question asked if the inspector provided helpful suggestions to assist the permittee in complying with the permit requirements. Most permit holders answered yes (140 out of 155). (Question 7 on the survey).

Another question asked if the department's inspector was professional in appearance and in delivery of services. One hundred fifty-three answered yes to this question and 2 permit holders did not answer. Several comments were received including that staff were assets to the department, that they were professional and that they did a good job.

We also asked the IAV recipients to rate the IAV on a scale of 1 to 10 (10 being best) on how helpful staff visits were in assisting facilities with understanding their permits. An overall rating of 9.2 out of 10 was received (unnumbered question 9).

The final question on the survey asked the IAV recipient for any additional suggestions or comments. The department received many comments and followed up as appropriate. (unnumbered questions 10).

Results

A total of 189 IAVs were conducted and a total of 155 surveys or 82 percent of the new permit holders completed a survey. A total of 52 surveys, or 34 percent of those were completed following contacts by the ombudsmen.

Table 1 – Initial Assistance Visit Overview

Permitting Offices	Contacted/ attempted to contact		IAV's scheduled/ conducted		Declined IAV		Failed to make contact		Surveys completed		No survey completed	
KCRO	43	19%	38	20%	4	1.8%	1	.04%	30	79%	8	11%
NERO	45	20%	37	20%	7	3%	1	.04%	30	81%	7	19%
SERO	50	22%	44	23%	6	2.6%	0	0%	33	75%	11	25%
SLRO	34	15%	23	12%	11	4.8%	0	0%	23	100%	0	0%
SWRO	57	25%	47	25%	7	3%	3	1.3%	39	83%	8	17%
Total/Average	229	100%	189	100%	35	15.3%	5	2.1%	155	82%	34	18%

New permit holders were asked to rate the IAV on a scale of 1 to 10 (10 being best) on how helpful staff visits were in assisting facilities with understanding their permits. The department received an overall rating of approximately 92 percent. Detailed results by regional office and environmental media are shown in Table 2 below.

Table 2 – Rating permit holder gave department on scale of 1-10 (10 being best)

Average rating by regional office		Average rating by environmental media	
KCRO	72.2%	APCP	89.5%
NERO	89%	HWP	93.5%
SERO	94%	LRP	96.4%
SLRO	88%	PDWP	92.9%
SWRO	92%	WPP	87.7%
Average Total	92%	Average Total	92%

IAV recipients that returned surveys reported that the department spent approximately 265 hours or about 1.74 hours at each facility. During the IAVs, staff assisted permit holders by explaining the permit, training permit holders on required sampling, record keeping, operations and maintenance and areas where the facility had good performance as well as areas of concern.

Table 3 – Average time spent with facilities as reported on surveys (assumption: 1-2 hours = 1.5)

Average time spent at facility by regional office		Average time spent at facility by environmental media	
KCRO	1.9 hours	APCP	2.03 hours
NERO	1.88 hours	HWP	1.65 hours
SERO	1.61 hours	LRP	2.32 hours
SLRO	1.59 hours	PDWP	1.66 hours
SWRO	1.69 hours	WPP	1.61 hours
Total	1.74 hours	Average	1.85 hours

Conclusion

A significant percentage of responders to this survey (approximately 99 percent) believe they are well served by competent and professional department staff. Additional information provided as comments will also be evaluated to help us improve.

Staff will continue to survey facilities. As any concerns with communication, professionalism and training is identified we will address each to improve our effectiveness. Several factors will be evaluated and refined including

- The amount of time needed with each permit holder
- Whether the department's emphasis on technical assistance is being directed to the types of permits that have the most problems
- Training needs for department staff to help them become better communicators
- Whether the department is asking for just what is needed
- Whether the number of complaints about problem facilities is declining as a result of this effort
- Whether the department's routine compliance inspections are showing overall improvements in compliance rate